



DEPARTMENT OF VETERANS AFFAIRS
Medical Center
4150 Clement Street
San Francisco, CA 94121

AUG 11 2015

In Reply Refer To: 662/138

Carol Roland-Nawi, Ph.D
State Historic Preservation Officer
Office of Historic Preservation
Department of Parks & Recreation
1725 23rd Street, Suite 100
Sacramento, CA 95816

**Subject: Section 106 Initiation for the San Francisco Veterans Affairs Medical Center
Long Range Development Plan Sub-phase 1.11**

Dear Ms. Roland-Nawi:

The U.S. Department of Veterans Affairs (VA) is proposing to provide a new 11,000 to 13,000 square foot administrative building to house the Veterans' Health Research Institute (NCIRE) and General Internal Medicine staff at the San Francisco Veterans Affairs Medical Center (SFVAMC) at Fort Miley in San Francisco, California. The SFVAMC is located on a 29-acre site in northwest San Francisco (see Exhibits 1 and 2) and is a major tertiary care facility that serves as a VA regional referral center for specialized medical and surgical programs. The 12-acre SFVAMC National Register Historic District (see Exhibit 3) lies within the boundaries of the SFVAMC Fort Miley Campus, and the proposed undertaking is located within the Historic District (see Exhibit 4). The proposed undertaking addressed in this initiation letter involves removal of Building 31 (a non-contributor to the historic district), relocation of existing oxygen tanks, and construction of new Building 43 (see Exhibit 5).

Per the requirements of the National Historic Preservation Act (NHPA) and the *Programmatic Agreement Among the U.S. Department of Veterans Affairs, Veterans Health Administration, San Francisco Veterans Affairs Medical Center; the Advisory Council on Historic Preservation; and the California State Historic Preservation Officer Regarding the Long Range Development Plan for the San Francisco Veterans Affairs Medical Center* (the PA) dated November 25, 2014 and executed January 9, 2015, the VA is contacting you to initiate consultation in the early stages of project development prior to completing the Schematic Design of the proposed LRDP Sub-Phase 1.11 development project. As the project site for this sub-phase of the Long Range Development Plan (LRDP) is located within the SFVAMC Historic District, we are following the consultation procedures outlined under PA Review Category A, as previously identified in Attachment B of the PA. Additionally, there are two existing 3,000 gallon oxygen tanks near the center of the proposed new Building 43 footprint that require relocation to a site adjacent to the new building. A new concrete pad, enclosure, truck parking location and 12'x12' drop-off pad will be required.

This letter constitutes the review initiation for the proposed undertaking per the directives of Review Category A and includes a written description of the proposed sub-phase and any way in which it differs from what is described in the LRDP Finding of Effect (FOE) and how the design applies the *Secretary of the Interior's Standards for the Treatment of Historic Properties (SOISTHP)*.

Proposed Sub-Phase Undertaking

Existing Conditions

The SFVAMC Historic District includes approximately 12 acres of the SFVAMC campus' 29 acres. The District includes 14 contributing buildings and 7 noncontributing buildings (including Building 31). New Building 43 would be immediately adjacent to four contributors: Buildings 2, 3, 4 and 6. The District's contributing buildings were all built in 1934, with the exception of Building 18, which was built in 1897 and altered in 1934. Building 2 was originally the centerpiece of the original campus, but its integrity has been diminished significantly over time through a series of insensitive alterations and adjacent new construction. Buildings 3 and 4 are subsidiary buildings that do not possess the same amount of architectural detail as Buildings 2 and 6, but retain a level of architectural significance that qualifies them for listing as contributors to the district. Building 6 has a level of embellishment similar to that of Building 2. Building 31 is located northeast of Building 4, and is adjacent to the rear (north) elevation of Building 2. Set within the boundary of the San Francisco Veterans Affairs Medical Center Historic District boundaries, Building 31 was constructed in 1986 and is a non-contributor within the district.

Included in this submission are photographs of the existing site and building conditions.

Proposed Improvements¹

The removal of Building 31 and construction of new Building 43 are identified as Sub-phase 1.11 in Attachment B to the LRDP PA between the VA and the State Historic Preservation Officer (SHPO). The selected on-campus location for new building 43 is adjacent to Buildings 2, 3, 4 and 6. It is across Veteran's Drive from the slide area. New Building 43 will be a two-and-a-half to three-story (11,000-13,000 sq.ft.) administration building. Building in this location will require the removal of Building T-31 and the relocation of the existing oxygen tanks. Adjacent fences, bollards, oxygen tanks, a concrete truck ramp, and housekeeping pads are also proposed for demolition. The existing loading zone will be maintained, allowing included to prevent un-authorized access to the loading zone.

The entrance to new Building 43 will be on Veteran's Drive, from the North. The building will face the Presidio and the Golden Gate, with views of the Marin Headlands on clear days. Where possible, views will be maximized through the use of glazing. Pedestrian access will be from a reconfigured sidewalk, which will improve the campus's overall pedestrian circulation.

Two existing abandoned vaults will require removal and back-filling as part of this project. They are centrally located under the footprint of the building and could be a source of issues for the new building, particularly in a seismic event. The existing emergency water backflow preventer device will remain in place.

The structural system proposed for New Building 43 is a steel frame building with a CMU perimeter shear wall lateral system. The new building will be a two-and-a-half to three-story structure depending on the selected layout. The roof and floors will consist of 3 inch 18-gauge metal deck with 3 ¼" of light weight concrete fill. The roof and floor framing will be steel wide flange framing on approximately 10 foot centers. The floor system will be designed for standard office vibration criteria per the American Institute of Steel Construction (AISC) specifications. The floor and roof framing will be supported on wide flange steel columns.

¹ Information regarding proposed improvements in this letter has been quoted and adapted from the "Conceptual Site Evaluation and Assessment Report," by the Department of Veterans Affairs and Polytech Associates, Inc. (24 October 2014), which includes project narrative and massing diagrams.

As part of the project, the two existing 3,000 gallon oxygen tanks are proposed for replacement with larger 9,000 and 1,500 gallon tanks to increase storage capacity and minimize number of deliveries.

Only massing diagrams exist at this stage for the proposed new building, and an architectural design has yet to be developed. Three massing options have been identified and are described below. (See plan drawings for each option attached to this document.)

Architectural Narrative – Option 1

Option 1 is a 13,082 square foot, three-story building with the oxygen tanks relocated to the east. It is stepped back from Veteran's Drive, providing a potential location for a useable roof or balcony overlooking the views.

Under this option, oxygen tanks would be moved to the east of new Building 43. This would require the reconfiguration of the stairs to the basement of Building 3. Planting would be provided between the tank enclosure and the sidewalk to partially visually screen the tanks from the street. Truck parking could be within the building site, separated from the street by the sidewalk and the bollards, in a tanker parking area adjacent to the north wall of Building 43.

Due to the proximity of this tank location to Building 3, Occupational Safety and Health Administration (OSHA) requires that the sides of the new oxygen tank enclosure facing Building 3 and the existing transformers would be required to have 2 hour block walls, to a height equal to Building 3.

Architectural Narrative – Option 2

Option 2 is a 13,290 square foot, three-story building with the oxygen tanks relocated to the east. A maximized footprint provides a more efficient building design. Oxygen tank delivery truck parking is partially on Veteran's Drive and partially on the sidewalk.

Under this option, oxygen tanks would be moved to the east of new Building 43. This would require the reconfiguration of the stairs to the basement of Building 3. Planting would be provided between the tank enclosure and the sidewalk to partially visually screen the tanks from the street. Truck parking would be adjacent to the oxygen tank area, and partially adjacent to Building 3. Due to the proximity of the tank location to Building 3, OSHA requires that the sides of the new Oxygen Tank Enclosure facing Building 3 and the existing transformers would be required to have 2 hour block walls, to a height equal to Building 3.

Architectural Narrative – Option 3

Option 3 is an 11,878 square foot, three-story building with the oxygen tanks relocated to the west. Oxygen tank delivery truck parking is separated from vehicular traffic by fixed bollards and is usable as a pedestrian walkway when deliveries are not being made.

The project site is a campus infill site bounded by Veterans Drive to the north, Building 3 to the east, building 2 to the south and Buildings 4 and 6 to the west. New landscaping will be limited to screen plantings at utilities and service areas. Fixed and removable bollards will control vehicular traffic. New landscaping will be limited to screen plantings at utilities and service areas. Plantings will incorporate primarily evergreen low- and moderate water-use selections.

LRDP FOE Consistency

The proposed project was not specifically discussed in the Finding of Effect for Long Range Development Plan, San Francisco Veterans Affairs Medical Center prepared by AECOM in June 2013. Attachment B of the LRPD PA, however, refers to the project as Sub-phase 1.11, Trailer 31 removal and Building 43 (Research and Administration) construction. This document provides the following Finding of Effect Analysis:

Sub-phase 1.11 would involve the removal of a non-contributing trailer located within the boundaries of the HD. The removal of this non-contributor from the district would remove a visual

and physical intrusion on the district. In its place would be a new building that would introduce a new visual intrusion on the district.²

The proposed undertaking appears to coincide generally with the previous descriptions as outlined in the FOE and the PA, but also includes the relocation of two oxygen tanks on the project site. These are not contributing elements to the district.

Application of the SOISTHP

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

Comment: The property's use will continue to support the campus' function as a VA medical facility.

2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

Comment: The proposed undertaking includes the removal of a non-contributing trailer located within the boundaries of the historic district. The removal of this non-contributor from the district would remove a visual and physical intrusion on the district. However, a new, larger building and larger oxygen tanks will be installed on the site; this will introduce new visual intrusions to the district. The larger oxygen tanks are intended to increase storage capacity and minimize number of deliveries to the site. Location of the new and oxygen tanks would also require removal of some or all of the remaining open space (once covered by grass, now AstroTurf) in this area, which according to the National Register nomination for the district, is a remnant of the original landscape design. This would further change the historic character of the district.

3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

Comment: The architectural design has yet to be finalized for the new construction. As such, a full assessment of the proposed project under this Standard is not possible at this time. However, at present there are no details that indicate that the design would create a false sense of historical development. The SFVAMC intends to identify a new design that is compatible with the existing historic district through ongoing consultation with the historic preservation consultant.

4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

Comment: No changes relative to the proposed project have acquired historic significance over time.

5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.

Comment: As a non-contributing structure, Building 31 maintains no distinctive features, finishes, or construction techniques that contribute to the character of the Historic District. No work would

² Attachment B to the LRDP PA between the VA and the State Historic Preservation Officer (SHPO), 27.

be done to any distinctive features or finishes of any district contributor as part of this undertaking.

6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

Comment: No work would be done to any historic features as part of this undertaking.

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

Comment: There no plans for any chemical or physical treatments to be undertaken on any historic materials as part of this project.

8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

Comment: The Archaeological Data Recovery Plan Template for the SFVAMC is included Attachment C of the PA. The proposed new construction may include ground disturbing activities. If any discoveries are made during construction, then the PA procedures would be followed.

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

Comment: The proposed undertaking includes construction of a new two-and-a-half to three-story building within the historic district, immediately adjacent to Buildings 2, 3, 4, and 6. New larger oxygen tanks are also included as part of the proposed project. The location of new construction in this area further diminishes the integrity of setting of Building 2 by obscuring a substantial portion of the building's exterior from view. Previous alterations have already obscured much of this building's exterior.

The massing and size of the proposed building would be generally compatible with Buildings 2, 4, and 6. In Options 1 and 2 the new building would be approximately fifteen feet taller than Building 3, and the massing would step up and away from the smaller Building 3, creating greater compatibility in form and massing than shown in Option 3. However, as part of Options 1 and 2, new large oxygen tanks will be located in the space between Building 3 and new Building 43. The size of these tanks are incompatible with Building 3 and introduce further visual impacts to the district and its setting. Options 1 and 2 also require removal and replacement of the exterior stair on the west side of Building 3. This stair does not appear to be original to the building and its removal would not be considered an impact to the building or the district setting, though further detailing of a new stair in this location should include protection of the building's historic materials.

Location of a new building in this area would also require removal of some or all of the remaining open space (once covered by grass, now AstroTurf) in this area, which according to the National Register nomination for the district, is a remnant of the original landscape design.

Further assessment under this Standard related to differentiation, massing, and architectural features will be required as the architectural design progresses.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Comment: The proposed new construction will not attach to any of the existing district contributors. As such, if new Building 43 were to be removed in the future, the essential form and integrity of the Historic District and its contributing structures would remain unimpaired.

Public Involvement

In accordance with our responsibilities under the PA, the SFVAMC will post the review initiation to its LRDP Section 106 website and notify all other Consulting Parties within 15 days of transmittal to the State Historic Preservation Office (SHPO). Following the receipt of acknowledgement of the review initiation and initial comments from SHPO, the SFVAMC will post the response to the SFVAMC website and notify Consulting Parties.

Summary

With this letter, the VA would like to initiate the review of the SFVAMC LRDP Sub-Phase 1.11 development project in accordance with the PA under Review Category A and in compliance with Section 106 of NHPA. We request your comments or guidance specific to this sub-phase.

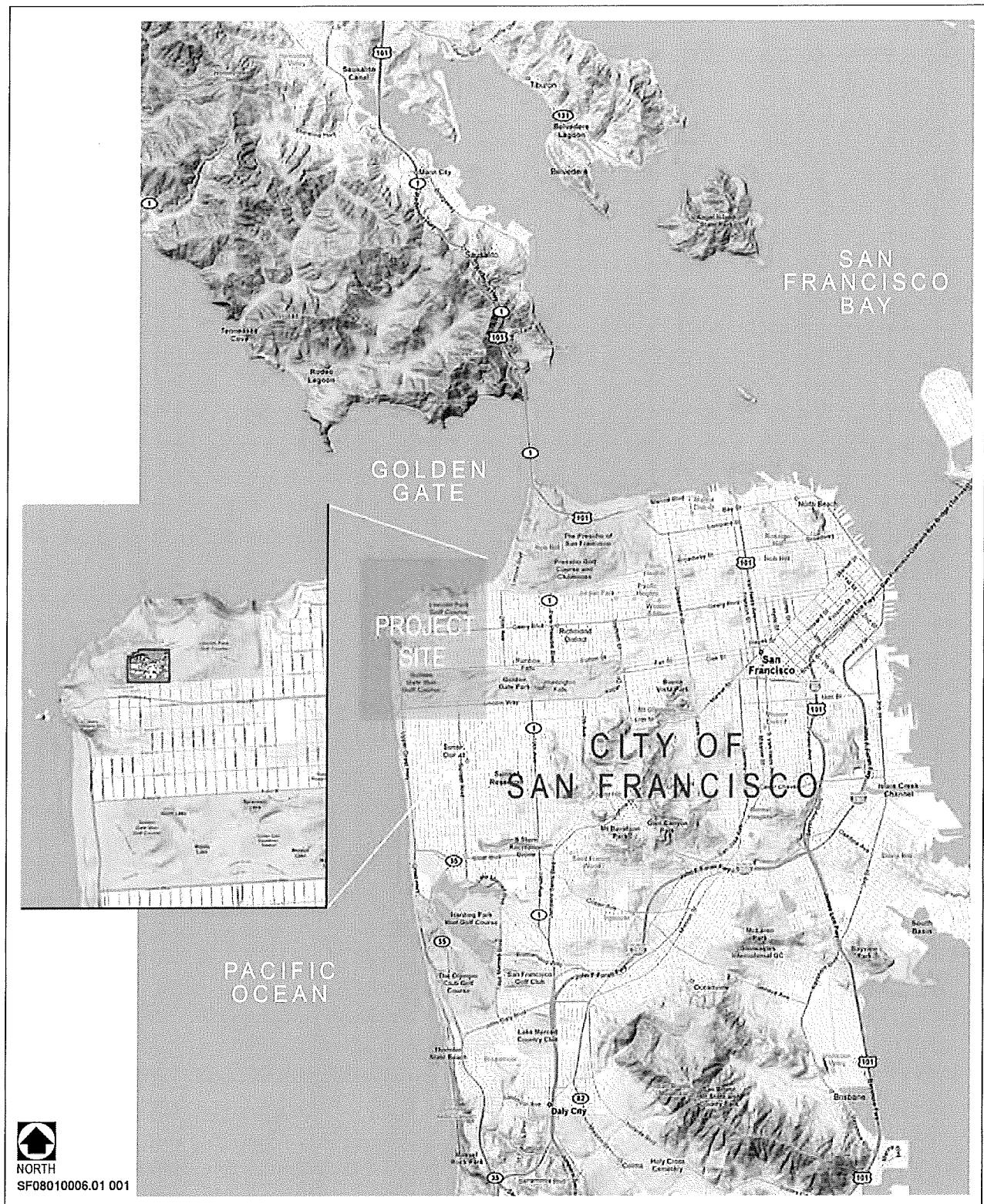
Should you have any questions about this project, please contact Ms. Robin Flanagan, Planning Office, San Francisco VAMC at 415-750-2049.

Sincerely,



Bonnie S. Graham, MBA
Medical Center Director

Attachments: Exhibit 1 (Location of SFVAMC Fort Miley Campus within Urban Context of San Francisco)
Exhibit 2 (SFVAMC Historic District Boundary)
Exhibit 3 (Sub-Phase location)
Exhibit 4 (Demolition Site Plan)
Existing Conditions Photographs
Plan Drawings, Proposed Project



Source: USVA, 2010

Exhibit 1: Location of SFVAMC Fort Miley Campus within Urban Context of San Francisco

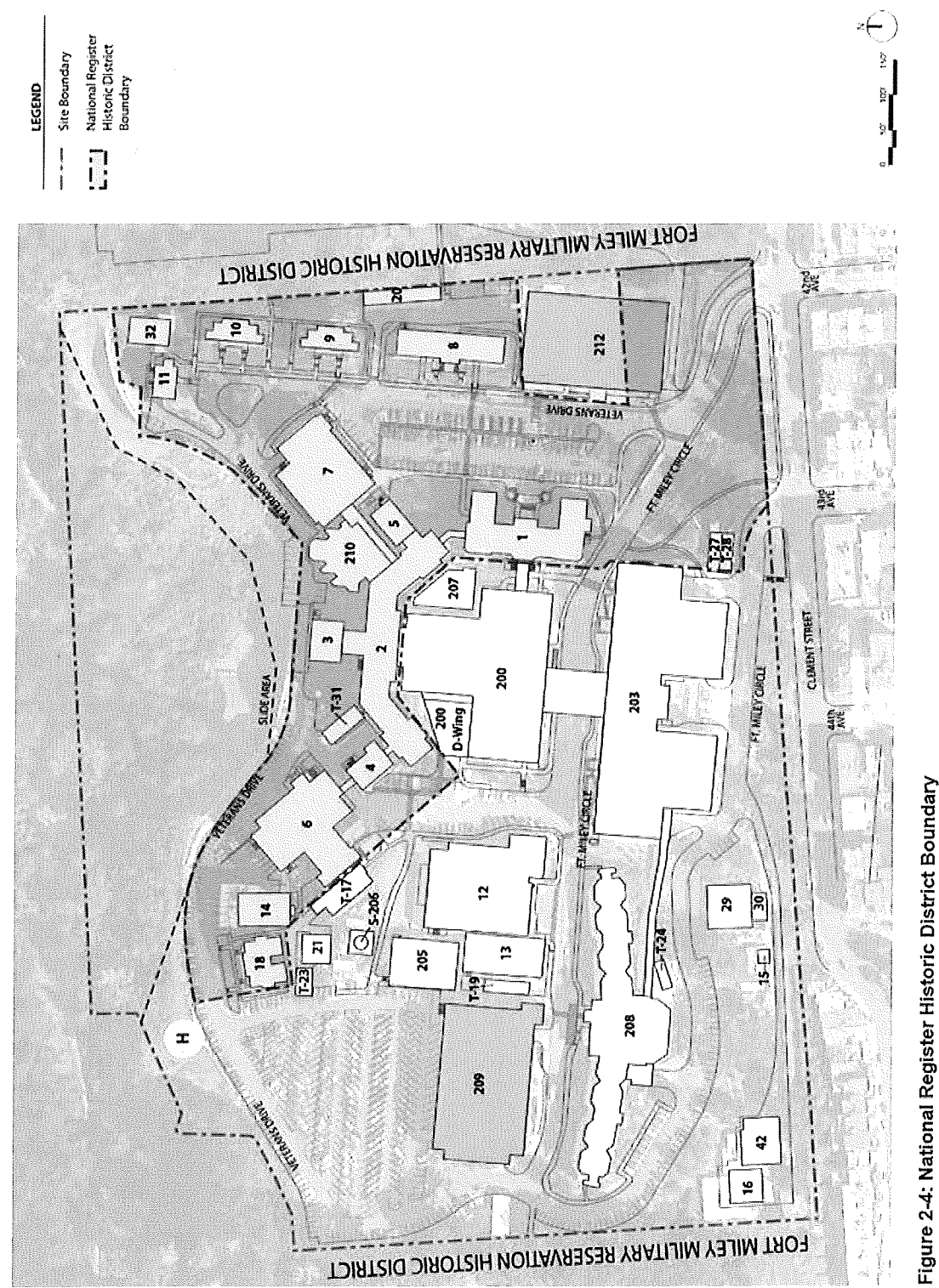
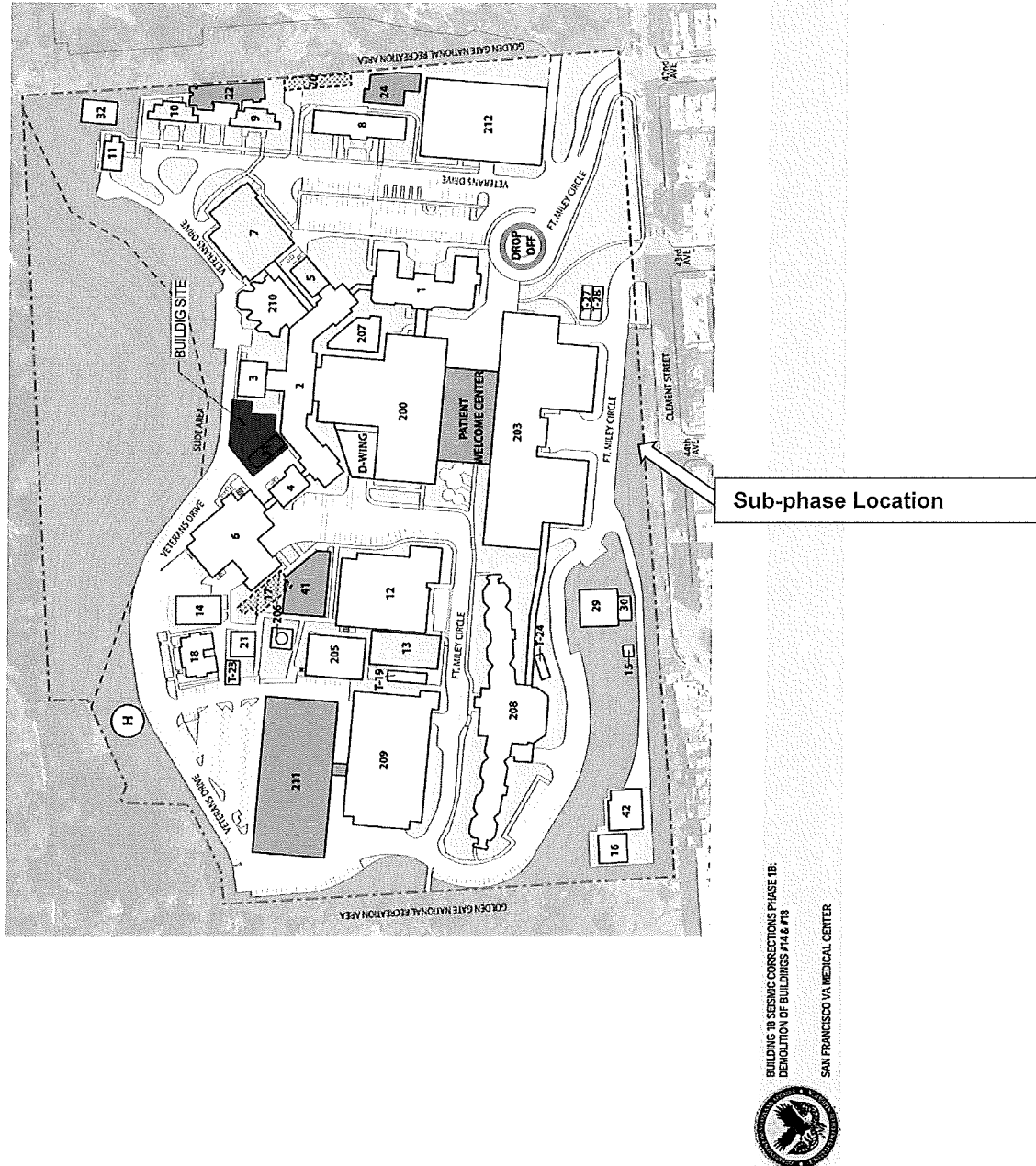


Figure 2-4: National Register Historic District Boundary

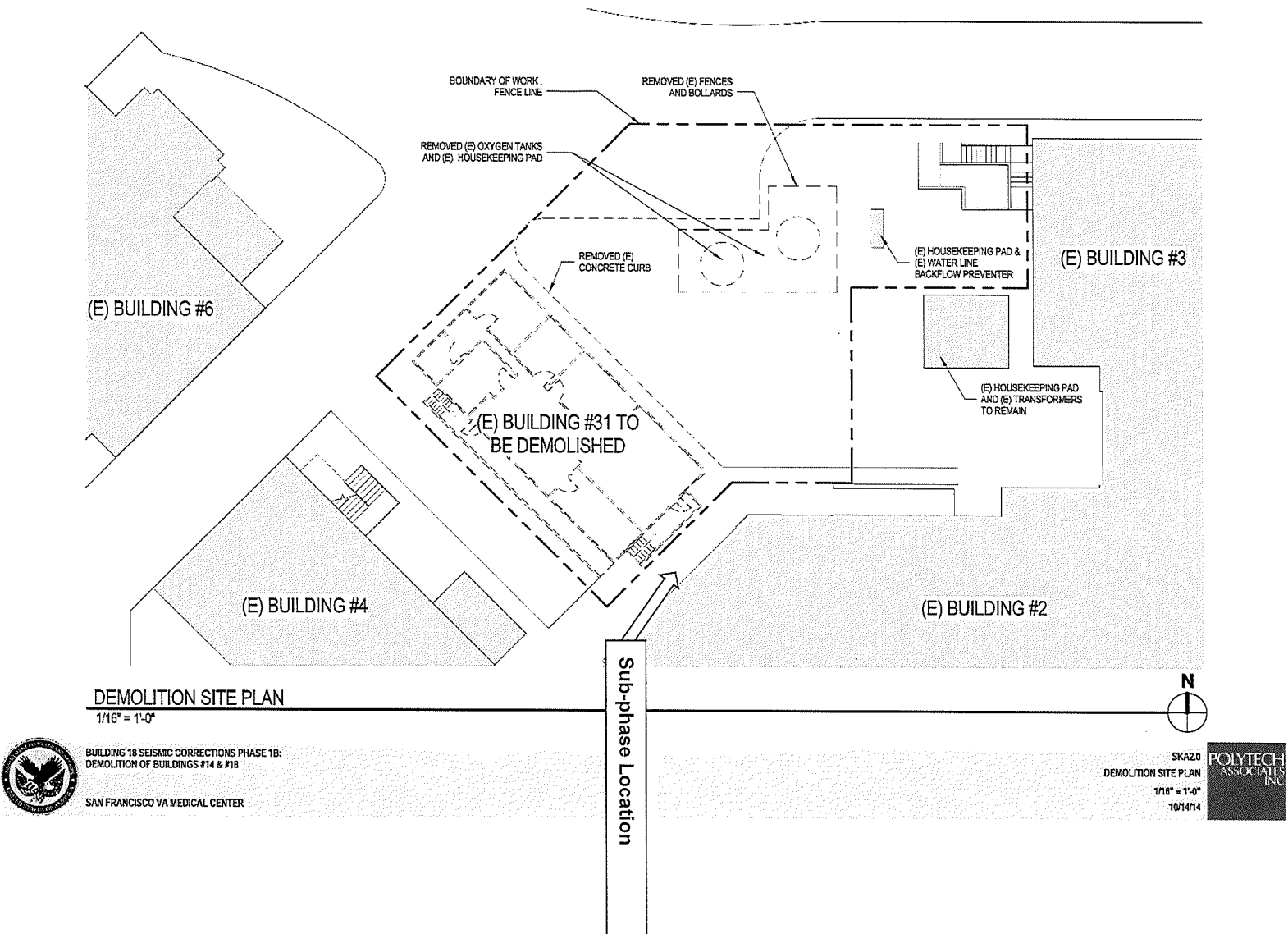
Source: SF VAMC Long Range Development Plan, 2014.

Exhibit 2: SFVAMC Historic District Boundary



Source: Site Assessment and Evaluation, Polytech Associates, Inc.

Exhibit 3: Sub-phase Location



Source: Site Assessment and Evaluation, Polytech Associates, Inc.

Exhibit 4: Demolition Site Plan

Existing Condition Photographs



Photograph 1: Red outline shows general location of proposed new Building 43, and current location of oxygen tanks and temporary building 31 (Source: ARG, August 2014).



Photograph 2: General location of proposed new Building 43, looking southwest from Veteran's Drive (Source: ARG, August 2014).



Photograph 3: Looking south at temporary building 31 from Veteran's Drive (Source: ARG, August 2014).



Photograph 4: Detail of oxygen tanks from Veteran's Drive (Source: ARG, August 2014).



Photograph 5: Temporary building 31 (Source: ARG, August 2014).



Photograph 6: View looking roughly southeast from Veteran's Drive, red outline shows general location of proposed work (Source: ARG, August 2014).